

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

HANS A. QUAACK, ATTILIO PO
and KARL LEIBINGER, on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 03-CV-11566 (PBS)

STONINGTON PARTNERS, INC., a Delaware
Corporation, STONINGTON CAPITAL
APPRECIATION 1994 FUND L.P., a Delaware
Partnership and STONINGTON HOLDINGS, L.L.C., a
Delaware limited liability company,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10411 (PBS)

GARY B. FILLER and LAWRENCE PERLMAN,
Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10477 (PBS)

JANET BAKER and JAMES BAKER, JKBAKER LLC
and JMBAKER LLC,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM
(formerly known as ARTESIA BANKING CORP., SA),
Defendants.

No.: 04-CV-10501 (PBS)

DECLARATION OF PATRICK T. EGAN

Patrick T. Egan declares that:

1. I am a partner at Berman DeValerio Pease Tabacco Burt & Pucillo, co-lead counsel for Class Plaintiffs in *Quaak v. Dexia*, 03-11566, listed above.
2. I submit this declaration on behalf of Plaintiffs in each of the above-captioned actions in connection with Plaintiffs' Statement Concerning The Need For 30(b)(6) Deposition(s) Of Dexia Bank Belgium.
4. Annexed hereto are true and accurate copies of the following:
 - Exhibit A:** Excerpts from the transcript of the June 2, 2006 motions hearing before this Court;
 - Exhibit B:** Excerpts from the transcript of the September 19, 2006 deposition of Joris Van Helleputte;
 - Exhibit C:** Excerpts from the transcript of the September 21, 2006 deposition of Ivan De Coen;
 - Exhibit D:** Excerpts from the transcript of the October 19, 2006 deposition of Bart Ferrand;
 - Exhibit E:** Excerpts from the transcript of the October 24, 2006 deposition of Peter Rabaey (Volume I).
 - Exhibit F:** Excerpts from the transcript of the October 25, 2006 deposition of Peter Rabaey (Volume II).
 - Exhibit G:** Excerpts from the transcript of the October 26, 2006 deposition of Peter Rabaey (Volume III).

I declare under penalty of perjury that the foregoing is true and correct. Executed in Boston, Massachusetts this 14th day of November, 2006.

/s/ Patrick T. Egan

Patrick T. Egan